

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF DELAWARE

	x	
)	In proceedings for a
)	Reorganization under
)	Chapter 11
)	
)	
)	
In Re:)	
)	Jointly Administered Under
W.R. GRACE & CO., et al.,)	Case No. 01-1139-JKF
)	
)	
)	
)	
Debtor.)	
)	
)	
	x	

FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2019 STATEMENT
REPRESENTATION BY LIPSITZ, GREEN, FAHRINGER,
ROLL, SALISBURY & CAMBRIA, LLP

I, Joseph T. Kremer, Esq. and representative of Lipsitz, Green, Fahringer Roll, Salisbury & Cambria, LLP declare as follows:

1. I am a partner with the firm of Lipsitz, Green, Fahringer Roll, Salisbury & Cambria, LLP (hereinafter the "Firm". I am a member in good standing of the bar of the State of New York.

2. I am involved in the Firm's representation of asbestos personal injury claimants and basted upon that representation and the review of business records of the Firm I have personal knowledge of the facts set forth herein. I make this statement (the "Statement") pursuant to rule 2019 of the Federal Rules of Bankruptcy Procedure

and Pursuant to the terms of Judge Fitzgerald's October 22, 2004 Order of Court.

3. The Firm, a limited liability corporation is organized under the laws of the State of New York with its principal offices for the practice of law located at 42 Delaware Avenue, Suite 300 Buffalo, New York 14202.

4. As of the date of this Statement, the Firm represents a number of personal injury claimants (the ") Claimants" or individually, a "Claimant" who have been injured by asbestos or asbestos-containing products manufactured, marketed, distributed, sold, installed, or produced by the above-referenced debtors and debtors-in-possession (the "Debtors") and others, and thus hold claims against, *inter alia*, the Debtors. Attached Hereto as Exhibit "A" is a list of the Claimants represented by the Firm.

5. Each of these Claimants has employed the Firm under an employment contract (a/k/a retainer agreement) with the Firm. Each Claimant has also executed a separate power of attorney. In all cases, the Firm is authorized by law to act on Claimants' behalf. An actual copy of each agreement or instrument, whereby Lipsitz, Green, Fahringer Roll, Salisbury & Cambria, LLP is empowered to act on behalf of each claimant is attached hereto as Exhibits "WRG-Exhibit 1 (A-B)(C-F)(G-K)(L-O)(P-R)(S-V)(W-Z)".

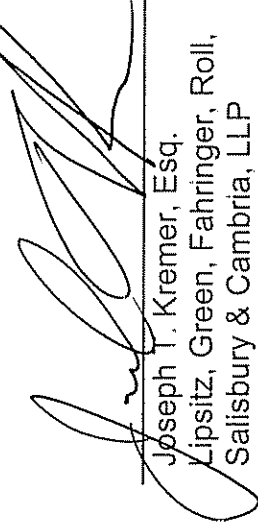
6. The address for each Claimant represented by Firm is found on Exhibit A hereto.

7. As previously set forth in paragraph 4 above, the nature of the claim held by each Claimant is a personal injury tort claim for damages caused by asbestos or asbestos-containing products manufactured, marketed, distributed, sold, installed, or produced by the Debtors and others.

8. Each Claimant is represented by the Firm under a fee agreement as referenced in paragraph 4 above. The firm holds each such instrument.
9. The filing of the Firm's Statement does not waive any rights including (i) the Claimants' rights to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) the Claimants' rights to trial by jury in any proceeding and any trial on their claims; (iii) the Claimants' rights to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal or abstention to the extent not previously directed; (iv) the Claimants' rights in not submitting themselves to the jurisdiction of the Bankruptcy Court; or (v) any other rights, claims, actions, defenses, reclamations, setoffs, or recoupments to which the Claimants are or may be entitled under any agreements in law or in equity, all of which rights, claims, actions, defenses, reclamations, setoffs, and recoupments the Firm's Claimants expressly reserve.

I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct.

Executed this 20th day of December, 2004, at Buffalo, NY



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